

MORGAN, LEWIS & BOCKIUS LLP  
 MELINDA S. RIECHERT, (SBN 65504)  
 mrieichert@morganlewis.com  
 2 Palo Alto Square  
 3000 El Camino Real, Suite 700  
 Palo Alto, CA 94306  
 Tel: 650.843.4000  
 Fax: 650.843.4001

MORGAN, LEWIS & BOCKIUS LLP  
 ADELMISE ROSEME WARNER (SBN 215385)  
 adelmise.warner@morganlewis.com  
 One Market, Spear Street Tower  
 San Francisco, CA 94105-1126  
 Tel: 415.442.1000  
 Fax: 415.442.1001

Attorneys for Defendant  
 HEWLETT-PACKARD COMPANY

Karen E. Ford Esq.  
 SW Ocean Ave & Mission, Suite 208  
 P.O. Box 287  
 Carmel-by-the-Sea, California 93921-0287  
 831-250-6433  
 Fax 831-250-6844  
[karen@fordslaw.com](mailto:karen@fordslaw.com)  
 SBN 88358  
 Attorney for Plaintiff Peter Siegel

**United States District Court  
 Northern District of California**

Peter Siegel,	)	
	)	Case No: 5:12-cv-03787 HRL
Plaintiff,	)	
	)	
vs.	)	<b>STIPULATION AND [PROPOSED]</b>
	)	<b>ORDER TO CONTINUE DEADLINES</b>
Hewlett-Packard Company,	)	<b>SET BY CASE MANAGEMENT ORDER</b>
	)	
Defendant	)	
	)	

DB2/ 24295398.1

Stipulation and [Proposed] Order Continuing Case Management Deadlines

**STIPULATION TO CONTINUE CASE MANAGEMENT DEADLINES**

Pursuant to Local Rules 6-2 and 7-12 the parties, by and through their undersigned counsel, hereby stipulate to entry of an order continuing the fact discovery deadline in this matter from August 13, 2013 until September 30, 2013 for the purpose of allowing the parties to complete depositions currently noticed by the Parties, and the deadline for hearing on motions for summary judgment from October 8, 2013 until December 3, 2013. All other deadlines are to be extended correspondingly. The grounds for seeking this continuance are set out in the Declaration of Counsel filed herewith. The limitation on the scope of discovery during the extension is a limitation placed on the stipulation by Defendant. Plaintiff does not agree that the extended discovery should be limited in any way and reserves all rights in this regard. Specifically, the parties stipulate as follows:

The fact discovery cutoff in this matter shall be continued until September 30, 2013 for the purpose of allowing the parties to complete depositions currently noticed by the Parties; and

The deadline for hearing on motions for summary judgment other than the currently pending motion shall be continued until December 3, 2013; and

All other case management deadlines after August 1, 2013 including expert discovery and the pretrial conference shall be continued correspondingly.

There have been no previous continuances of any deadline set by the Case Management Order in this matter.

Dated this 12<sup>th</sup> day of August 2013

/s/

Melinda S. Riechert  
Morgan, Lewis & Bockius LLP  
Attorney for Defendant  
Hewlett-Packard Company

/s/

Karen E. Ford Esq.  
Attorney for Plaintiff  
Peter Siegel

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Stipulation and [Proposed] Order Continuing Case Management Deadlines

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**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED,

The deadlines set out in the case management order in this case are hereby continued as follows:

Fact Discovery Cutoff: \_\_\_\_\_ for the purpose of allowing the parties to complete depositions currently noticed by the Parties and other discovery already served, without prejudice to Plaintiff's right to argue that Plaintiff should be allowed to conduct additional discovery.

Designation of Experts with Reports: \_\_\_\_\_

Designation of Rebuttal Experts with Reports \_\_\_\_\_

Expert Discovery Cutoff \_\_\_\_\_

Last Day for Hearings on Dispositive Motions other than the currently pending motion \_\_\_\_\_ at 10:00 a.m.

Final Pretrial Conference \_\_\_\_\_

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Dated: \_\_\_\_\_

**HOWARD R. LLOYD**  
United States Magistrate Judge

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Stipulation and [Proposed] Order Continuing Case Management Deadlines

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